

**BOEHM, KURTZ & LOWRY**

ATTORNEYS AT LAW  
36 EAST SEVENTH STREET  
SUITE 1510  
CINCINNATI, OHIO 45202  
TELEPHONE (513) 421-2255

TELECOPIER (513) 421-2764

**Via E-FILE**

February 19, 2019

Public Utilities Commission of Ohio  
PUCO Docketing  
180 E. Broad Street, 10th Floor  
Columbus, Ohio 43215

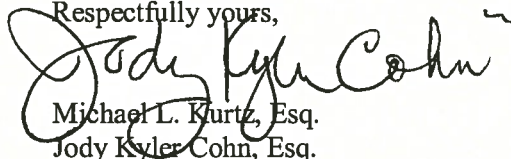
**In re: Case No. 19-0232-EL-RDR**

Dear Sir/Madam:

Please find attached JSW STEEL OHIO, INC's MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT e-filed today in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,



Michael L. Kurtz, Esq.

Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY**

MLKkew

Encl.

Cc: Certificate of Service

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company to Adjust the Economic Development Cost Recovery Rider Rate.	: :	19-0232-EL-RDR
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**MEMORANDUM IN SUPPORT OF  
JSW STEEL OHIO, INC.'s MOTION TO INTERVENE**

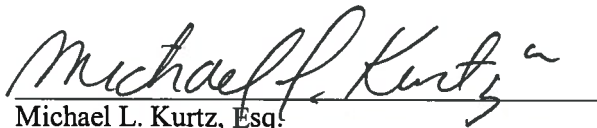
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Pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11, JSW Steel files this Memorandum in Support of its Motion to Intervene.

JSW Steel is a large energy-user that purchases electric service from Ohio Power Company pursuant to a reasonable arrangement approved by the Commission. The interests of JSW Steel may be directly affected by the outcome of this proceeding and cannot be adequately represented by any other party. JSW Steel's intervention would not unduly delay the proceeding nor unjustly prejudice any existing party. JSW Steel intends to play a constructive role in this case and provide information which will assist the Commission.

Accordingly, JSW Steel has a real and substantial interest and is entitled to intervene in this action under R.C. 4903.221 and Ohio Adm. Code 4901-1-11.

Respectfully submitted,



Michael L. Kurtz, Esq.

Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY**

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: [mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)

[jkylercohn@BKLawfirm.com](mailto:jkylercohn@BKLawfirm.com)

**COUNSEL FOR JSW STEEL OHIO, INC.**

February 19, 2019

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company to Adjust the Economic Development Cost Recovery Rider Rate.	: :	19-0232-EL-RDR
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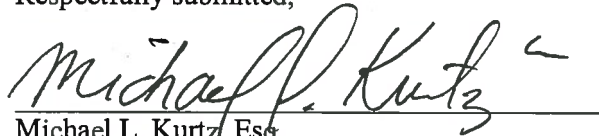
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**MOTION TO INTERVENE  
OF JSW STEEL OHIO, INC.**

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Pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11, JSW Steel Ohio, Inc. ("JSW Steel") moves for leave to intervene in this proceeding. The Public Utilities Commission of Ohio ("Commission") should grant JSW Steel leave to intervene because JSW Steel has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede JSW Steel's ability to protect that interest.

Respectfully submitted,



Michael L. Kurtz, Esq.

Jody Kyler Cohn, Esq.

**BOEHM, KURTZ & LOWRY**

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: [mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)

[jkylercohn@BKLawfirm.com](mailto:jkylercohn@BKLawfirm.com)

February 19, 2019

**COUNSEL FOR JSW STEEL OHIO, INC.**

## CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 19<sup>th</sup> day of January, 2019 to the following:



Michael L. Kurtz, Esq.  
Jody Kyler Cohn, Esq.

\*PRITCHARD, MATTHEW R. MR.  
MCNEES WALLACE & NURICK  
21 EAST STATE STREET #1700  
COLUMBUS OH 43215

ERAMET MARIETTA INC  
MATTHEW R PRITCHARD  
MCNEES WALLACE & NURICK LLC  
21 EAST STATE ST, 17TH FLOOR  
COL OH 43215

GLOBE METALLURGICAL INC  
MICHAEL SETTINERI  
VORYS, SATER, SEYMOUR AND PEASE LLP  
52 EAST GAY STREET, P.O. BOX 1008  
COLUMBUS OH 43216-1008

TIMKENSTEEL CORPORATION  
MICHAEL SETTINERI  
VORYS, SATER, SEYMOUR AND PEASE LLP  
52 EAST GAY STREET, P.O. BOX 1008  
COLUMBUS OH 43216-1008

\*SETTINERI, MICHAEL J. MR.  
VORYS, SATER, SEYMOUR AND PEASE LLP  
52 EAST GAY STREET  
COLUMBUS OH 43215

\*NOURSE, STEVEN T MR.  
AMERICAN ELECTRIC POWER SERVICE  
CORPORATION  
1 RIVERSIDE PLAZA, 29TH FLOOR  
COLUMBUS OH 43215

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**2/19/2019 5:09:21 PM**

**in**

**Case No(s). 19-0232-EL-RDR**

Summary: Motion JSW Steel Ohio, Inc. Motion to Intervene and Memorandum in Support electronically filed by Mr. Michael L. Kurtz on behalf of JSW Steel Ohio, Inc.